

EXHIBIT F

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

PETER DELVECCHIA, <i>et al.</i> ,)	Case No: 2:19-CV-01322-KJD-DJA
)	
Plaintiffs,)	PLAINTIFFS' RESPONSES AND
)	OBJECTIONS TO DEFENDANT
vs.)	FRONTIER'S SECOND SET OF
)	REQUESTS TO PRODUCE
)	
FRONTIER AIRLINES, INC., <i>et al.</i> ,)	
Defendants.)	
)	

Plaintiffs, by counsel, hereby respond to the Second Set of Requests to Produce propounded by Defendant Frontier Airlines, Inc. ("Frontier") pursuant to Fed.R.Civ.P. 34 as follows:

OBJECTION TO THE INSTRUCTIONS

Plaintiffs object to the instructions preceding the Requests to Produce. They are boilerplate instructions that attempt to alter Plaintiff's responsibilities under the Federal Rules of Civil Procedure and/or state rules that Frontier itself has repeatedly refused to follow in this litigation. Plaintiffs will respond in accordance with the Federal Rules of Civil Procedure, and do not agree to comply with any additional terms.

OBJECTION TO THE DEFINITIONS

Plaintiffs object to Definitions 1, 2, and 7, as they attempt to ascribe meanings to ordinary words that differ from common usage. Plaintiffs will assume any word used in the Interrogatories carries only its ordinary dictionary meaning for the specific context in which it is used. Plaintiffs do not agree to be bound by any artificially ascribed different or expanded meanings contained in the Definitions.

RESPONSES AND OBJECTIONS TO THE REQUESTS

1. All documents, including, but not limited to, correspondence, emails with all attachments *[sic]*, letters *[sic]*, and facsimile transmissions *[sic]* received by you pursuant to a subpoena or FOIA *[sic]* issued by you to third-parties *[sic]*. This Request includes all “no record statements” and Declarations and Certifications of Authenticity of Records received in response to any request for records.

OBJECTION: “[*Plaintiffs*] object[] to Request for Production No. 1 on the grounds that it is overly broad and seeks information that is not relevant to any party’s claim or defense and/or not proportional to the needs of the case. [*Plaintiffs*] further object on the grounds that producing such information may violate privacy rights held by [*certain*] individual[s].” Defendant Frontier Airlines, Inc.’s Responses to Requests for Production dated November 18, 2019 (modified).

2. If you denied Frontier’s Request to Admit No. 1 to Plaintiff Peter DelVecchia, produce all invoices and other documents that show that you incurred medical expenses related to your claims set forth in the Third Amended Complaint.

RESPONSE: Not applicable. Plaintiff A.D. did not deny the referenced Request to Admit.

3. If you denied Frontier’s Request to Admit No. 2 to Plaintiff Peter DelVecchia, produce all documents that show that you sustained economic damages related to your claims set forth in the Third Amended Complaint.

RESPONSE: Not applicable. Plaintiff A.D. did not deny the referenced Request to Admit.

4. If you denied Frontier’s Request to Admit No. 3 to Plaintiff Peter DelVecchia, produce all documents that show that you have been treated by a medical or mental health professional for severe or extreme emotional distress caused by the Incident.

RESPONSE: Not applicable. The referenced Request to Admit was admitted.

5. If you denied Frontier’s Request to Admit No. 4 to Plaintiff Peter DelVecchia, produce all documents that show that you were diagnosed as having suffered a concussion as a result of the Incident.

RESPONSE: Not applicable. Plaintiff A.D. did not deny the referenced Request to Admit (nor has he claimed that he suffered a concussion).

6. If you denied Frontier's Request to Admit No. 5 to Plaintiff Peter DelVecchia, produce all documents that show that you received treatment from a medical or mental health professional related to the Incident.

RESPONSE: Not applicable. Plaintiff A.D. did not deny the referenced Request to Admit.

7. If you denied Frontier's Request to Admit No. 6 to Plaintiff Peter DelVecchia, produce all documents that show that you were diagnosed with a mental disorder related to the Incident.

RESPONSE: Not applicable. Plaintiff A.D. did not deny the referenced Request to Admit.

8. If you denied Frontier's Request to Admit No. 7 to Plaintiff Peter DelVecchia, produce all documents that demonstrate, show [sic], establish [sic], relate to or address [sic] passengers having heard the allegedly defamatory statements made by Defendant Warren during the Subject Flight or on the Subject Aircraft.

RESPONSE: Not applicable. Plaintiff A.D. did not deny the referenced Request to Admit.

9. If you denied Frontier's Request to Admit No. 8 to Plaintiff Peter DelVecchia, produce all documents that demonstrate, show [sic], establish [sic], relate to or address [sic] passengers having witnessed or observed [sic] Defendant Warren commit a battery upon Plaintiff Peter DelVecchia during the Subject Flight.

RESPONSE: Not applicable. Plaintiff A.D. did not deny the referenced Request to Admit.

DATED this 6th day of July, 2022.


*Attorney for Plaintiffs Peter DelVecchia
And A.D., a Minor*

CERTIFICATE OF SERVICE

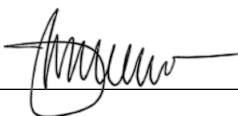
I HEREBY CERTIFY that on July 6, 2022, pursuant to prior agreement of counsel permitting electronic service by email, I served the foregoing responses and objections on counsel for Defendants by email addressed to the following persons:

Brian T. Maye, Esq.
Lawrence S. Gosewisch, Esq.

PETER DELVECCHIA'S RESPONSES & OBJECTIONS TO 2d SET OF RTPs

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